

Shainis & Heltzman, Chartered

Counselors at Law

Suite 290

1901 I Street, N.W.

Washington, D.C. 20036

(202) 293-0011

Fax (202) 293-0810

Aaron H. Shainis
Lee J. Heltzman

Of Counsel

William H. BuRoss, III

Ruth S. Baker-Battist

Robert J. Keller

January 27, 2000

RECEIVED

JAN 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

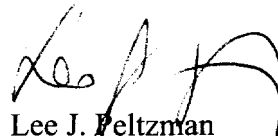
Ms. Magalie Salas
Secretary
Federal Communications Commission
Portals II - 12th Street Lobby
Filing Counter - TW-A325
445 - 12th Street, S.W.
Washington, DC 20554

Re: MM Docket No. 99-271
RM-9800
RM-9696
Amendment of Section 73.202(b)
Table of Allotments,
FM Broadcast Stations
Boulder City, Nevada;
Bullhead City, Lake Havasu City, Kingman,
Mohave Valley and Dolan Springs,
Arizona; and Ludlow, California

Dear Ms. Salas:

Transmitted herewith, on behalf of Mag Mile Media, L.L.C., is an original and four (4) copies of its Reply Comments in the above-referenced rule making proceeding. Please contact the undersigned in the event the Commission has any questions with respect to these Reply Comments.

Sincerely,



Lee J. Heltzman
Counsel for
MAG MILE MEDIA, L.L.C.

No. of Copies rec'd 0+4
List ABCDE

Enclosure

ORIGINAL

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

JAN 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 99-271
Table of Allotments,)	RM-9696
FM Broadcasting Stations)	
(Boulder City, Nevada,)	
Bullhead City, Lake Havasu City,)	
Kingman, Mohave Valley, and)	
Dolan Springs, Arizona, and)	
Ludlow, California)	

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

REPLY COMMENTS

Mag Mile Media, L.L.C. ("Mag Mile"), licensee of Station KFLG-FM, Bullhead City, Nevada, by its counsel, hereby submits its Reply Comments in the above-referenced docket pursuant to Public Notice, Report No. 2378, released January 11, 2000. In support of its position, Mag Mile submits the following:

The Commission Public Notice listed a counterproposal filed by Mag Mile to reallocate Channel 274C from Bullhead City, Arizona to Dolan Springs, Arizona and modify Station KFLG-FM to specify Dolan Springs as its community of license, and also allot Channel 272A to Mohave Valley, Arizona. However, on October 27, 1999, Mag Mile filed its "Withdrawal and

Request to Substitute Channels” in this proceeding. Mag Mile consented therein to the modified proposal of Centennial Broadcasting, L.L.C. (“Centennial”), which proposed that Channel 240A be substituted for Channel 272A at Mohave Valley and that Channel 289C be substituted for Channel 274C at Dolan Springs.

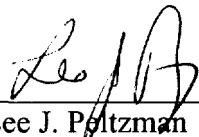
By these Reply Comments, Mag Mile incorporates by reference its position taken in its October 27, 1999 Withdrawal and Request to Substitute Channels. So as not to slow down the remainder of this proceeding, Mag Mile states that it is willing to accept approval of its Mohave Valley proposal subject to an interim condition as to that proposal to the effect that operation with facilities at Mohave Valley are subject to modification, suspension or termination if found by the Commission to be necessary to conform to the 1992 U.S.-Mexico FM Broadcast Agreement. See Avra Valley, Arizona, et al., 12 FCC Rcd 5956 (1997). Alternatively, the Commission may desire to sever Mag Mile’s Mohave Valley proposal from this proceeding since it no longer will conflict with any other proposal. See Avra Valley, Arizona, et al., 12 FCC Rcd 1202, 1205-06 (1997).¹

Accordingly, Mag Mile restates its position and urges that the Commission approve Centennial’s modified proposal, substitute Channel 289C at Dolan Springs, modify the KFLG-FM license and substitute Channel 240A at Mohave Valley.²

¹ In the event the Commission is unwilling to follow precedent and grant the Mohave Valley proposal with an interim condition or sever the Mohave Valley proposal from this proceeding, Mag Mile hereby dismisses its proposal and will refile it at a subsequent time.

² Consistent with the position Mag Mile took in its Withdrawal and Request to Substitute Channels, Mag Mile fully supports the substitution of Channel 289C for Channel 274C at Dolan Springs and substitution of Channel 240A for 272A at Mohave Valley, and further urges Commission approval of Centennial’s modified proposal. However, in the event the Commission does not grant Centennial’s proposal, Mag Mile requests as an alternative that Channel 274C be allotted at Dolan Springs and that the Commission modify Station KFLG-FM’s license accordingly.

Respectfully submitted,
MAG MILE MEDIA, L.L.C.

By: 

Lee J. Peltzman

SHAINIS & PELTZMAN, CHARTERED
1901 L Street, N.W. - Suite 290
Washington, D.C. 20036
202 293 0011

Its Attorney

January 27, 2000

CERTIFICATE OF SERVICE

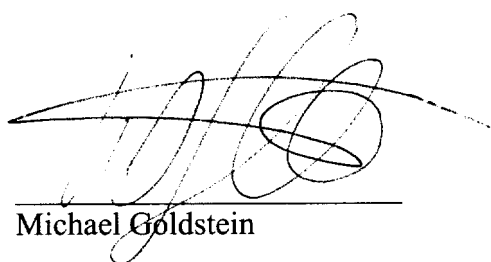
I, Michael Goldstein, secretary at the law firm of Shainis & Peltzman, Chartered, hereby certify that I mailed on this 27th day of January, 2000 a copy of the foregoing via U.S. Mail, first class, postage prepaid, to the following:

Robert Olender, Esq.
Baraff Koerner & Olender, P.C.
5809 Nicholson Lane, Suite 124
North Bethesda, MD 20852

Christopher G. Wood, Esq.
Fleischman and Walsh, L.L.P.
1400 - 16th Street, N.W.
Washington, DC 20036

M. Anne Swanson, Esq.
Dow Lohnes & Albertson
1200 New Hampshire Avenue, N.W., #800
Washington, DC 20036-6802

Leslie Shapiro
Federal Communications Commission
445 - 12th Street, S.W., **Room 3-A501**
Washington, DC 20554



Michael Goldstein